Exhibit 18
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May 30, 2019

VIA ECF

Honorable David T. Schultz
United States District Court
9E U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

Re: Fair Isaac Corp. v. Federal Insurance Co., et al.
        No. 16-cv-01054-WMW-DTS (D. Minn. Filed April 21, 2016)

Dear Judge Schultz:

We write in response to FICO's May 28, 2019 letter to the Court regarding RFP 90 and FICO's request for Federal's business rules (the "Blaze Rules"), which, as the Court is aware, is highly-confidential and commercially and competitively sensitive information.

In his May 28 letter, FICO's counsel demonstrates an understanding of how Federal uses the Blaze Rules and the benefits he believes are derived therefrom. Specifically, the letter states as an example, that "Federal uses business rules to determine whether to quote a risk and at what price," and that Blaze Advisor allows Federal to automate decision-making, i.e., "make faster, more precise, and more consistent decisions while reducing the complexity and cost of those decisions."

After showing his understanding of Federal's use of Blaze Advisor, FICO's counsel then contradictorily asserts that it needs the documents responsive to RFP 90, i.e., the Blaze Rules, to "show the integration of Federal's business rules into Blaze Advisor..." FICO already has an acute understanding of how Federal uses Blaze Advisor. FICO does not need the Blaze Rules themselves to understand how Federal's business rules are integrated into Blaze Advisor.

Nevertheless, FICO further argues that it wants the Blaze Rules so that its experts can respond to "Federal's expert reports touting the significance of Federal's business rules..." FICO's experts do not need the Blaze Rules in order to respond to Federal's expert reports. Indeed, Federal's experts did not have access to any of the Blaze Rules while preparing their expert reports. Moreover, FICO's expert witness, Bick Whitener, discusses at great length in his expert report how Federal uses Blaze Advisor. Nearly two-thirds of his report (excluding the Appendices) is dedicated to analyzing in detail each and every Federal application that FICO alleges uses Blaze

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Advisor. The report explains, for example, how Federal's use of Blaze Advisor contributes to revenue by increasing the speed of response, improving efficiencies in underwriting, etc. Simply put, reviewing the Blaze Rules will not add anything more to what FICO (and its experts) already understands about Federal's use of Blaze Advisor.

FICO then asserts that Federal never produced any documents even though Federal stated it would "produce non-privileged, responsive documents that are kept in the ordinary course of business." That is simply because there are no documents kept in the ordinary course of business that contain the Blaze Rules, which FICO already knows since the parties are submitting letters to the Court relating to various processes for extracting the Blaze Rules from computer systems.

Finally, FICO suggests two options for Federal to produce the Blaze Rules. The first option is for Federal to "produce the repository files (.xml) and business object model files (JAR (JAVA Archive) files))." This option is essentially the same as what Federal stated in its May 23 letter to the Court, namely, that Federal can generate a file for each ruleset. The problem with this proposed option is that although FICO can take the files, plug them into a compatible Blaze Advisor version, and generate an English version of the business rules, Federal would not be able to check the accuracy of the business rules generated by FICO. In order to confirm the accuracy of the business rules generated from FICO's processes, Federal would have to convert all of the business-rule files to English in order to do a comparison, which goes back to the options indicated in Federal's May 23 letter.

The second option FICO proposes is to run reports from the IDE environment. Although this option is technically possible, it will not provide FICO with a report that details all of the business rules. Given Federal's version of Blaze Advisor, the report will not reflect "Rule Sets and Functions," but merely "Decision Tables." Federal estimates the cost of this project to be $5,000.

Best regards,

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